

**RECEIVED**

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JUL 22 2024 MCP

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Daniel J. Fryar II

\_\_\_\_\_

Plaintiff(s),

vs.

Rahm Emanuel, Keith D. Hill (ATU)

Kathryn Lowder (CTA) John Cosia (ATU)

Defendant(s).

1:24-cv-06154  
Judge Matthew F. Kennelly  
Magistrate Judge Heather K. McShain  
RANDOM/ CAT 2

**COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS**

*This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.*

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Daniel J. Fryar II.

*If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.*

4. Defendant, C.T.A Kathryn Leude, is  
(name, badge number if known)

☐ an officer or official employed by C.T.A.;  
(department or agency of government) \_\_\_\_\_ or

☒ an individual not employed by a governmental entity.

***If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.***

5. The municipality, township or county under whose authority defendant officer or official acted is CHicago. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 7-24-23, at approximately 5:00 ☒ a.m. ☐ p.m.  
(month, day, year)  
plaintiff was present in the municipality (or unincorporated area) of CHicago  
IL., in the County of COOK,  
State of Illinois, at 567 W. LAKE ST. CTA Headquarters.  
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☒ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

Misrepresentation of documents, Drafting unenforceable contract, violations of constitutional, mishandling

Of my complete record

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: **(Leave blank if no custom or policy is alleged):** Kathryn Lund

8. Plaintiff was charged with one or more crimes, specifically:

Unknown felonies, NOT being forthcoming with a 2005 misdemeanor to management, w/o investigation. Allowed altered documents to be submitted into court, with my signature being forged onto them.

9. **(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")** The criminal proceedings

☐ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>

☒ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows multiple felonies no court no law enforcement could find, Refusal of findings.

☒ Other: Unknown Felony Charges, Dates, Courts or Judges

<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

4. Defendant, ATU Local 241 President Keith Hill, is  
(name, badge number if known)

☐ an officer or official employed by \_\_\_\_\_;  
(department or agency of government)  
\_\_\_\_\_ or

☒ an individual not employed by a governmental entity.

***If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.***

5. The municipality, township or county under whose authority defendant officer or official acted is CHicago. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about \_\_\_\_\_, at approximately \_\_\_\_\_ ☐ a.m. ☐ p.m.  
(month, day, year)  
plaintiff was present in the municipality (or unincorporated area) of CHicago  
IL., in the County of Cook,  
State of Illinois, at Union office of local 241,  
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other:

Harassed, Posted false claims to social media  
Made false statements to ILRB on behalf of

C.T.A., Refuses to follow up, Job interference.

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: **(Leave blank if no custom or policy is alleged):** Keith Hill

8. Plaintiff was charged with one or more crimes, specifically:

False felony charges, as explained by  
named person K. Hill.

9. **(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")** The criminal proceedings

☐ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>

☒ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows Refusal of representation, collusion  
with city and company.

☐ Other: \_\_\_\_\_.

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<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

ON May 8, 2024, it was discovered that between the Chicago Transit Authority and ATU local 241, brought forth Altered documents with my name forged onto them. I obtained the altered documents during a deliberations hearing between Brown vs. CTA, ATU. Case No. 22-cv-0675. This document is marked Exhibit 3. On May 8, 2024, I was actually able to recover the correct documents via FOIA from the CTA, which I did sign. Dowd, Bloch, Bennet, Carvone & Yokich LLP, 8 S. Michigan Ave. 19th floor Chicago IL 60603. Phone: (312) 372-6588 was the law firm that presented these documents on behalf of their client ATU. These documents are not only knowingly altered, but deliberately used to mislead the courts, but also deliberately divert questioning me to mislead my answers as to make me appear untruthful before the courts. When I tried to question something pertaining to Exhibit 3, I was shut down, and the questioning continued, by ATU attorneys.





July 28, 2023, a deliberations ~~hearing~~ <sup>hearing</sup> was called into session at about 10:00 am.

All law firm members were introduced. I introduced myself in person. At about 10:14 approx., hearing begins. I was handed exhibit 3, I looked through it, something did look off. I began answering questions. Noticed that Ex-Post-Facto rules were being violated. Though this <sup>was</sup> return to work/Tentative Agreement presented into court, the true purpose of it is that all violations of rules were already settled in the agreement on the part of C.I.A. and a promise from me NOT to violate rules again. Exhibit 1a is the true agreement I signed. Exhibit 1b & 1c are the altered documents.

There are two different documents dated in 2016, Exhibit 1a and 1b. Exhibit 1c was not only altered, but, the original document was completely removed. When I asked for proof of claims of any felonies committed, it was stated that it was "privileged information" by the union. I argued that felonies are "Public". Then ~~any~~ all attempts to communicate during deliberations ceased.



July 28, 2023, a telephone call was made to the witness.

Cells 1 and 2 were at about 10:00 am.

All testimony was given in the presence of the witness.

I interviewed the witness on July 28, 2023, at about 10:00 am.

In the interview, the witness stated that he had not

seen the witness on July 28, 2023, at about 10:00 am.

and that he had not seen the witness on July 28, 2023, at about 10:00 am.

He stated that he had not seen the witness on July 28, 2023, at about 10:00 am.

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He stated that he had not seen the witness on July 28, 2023, at about 10:00 am.

Under discovery, the following violations have become clear:

18 U.S. Code § 1519 - Destruction, alteration and/or falsification of records (Return to work) agreement / tentative agreement)

720 ILCS 5/17-3, 18 USC § 371, 18 U.S.C. § 401\*

18 U.S.C. Ch 25 (Counterfeiting + Forgery (Signature and Altered Documents), 18 U.S.C. § 371, 923, 18

Rule 60(d)(3) fraud on the courts; During deliberations hearing, I was handed Exhibit 3. I specifically stated "something doesn't look right here".

Dowd, Block, Bennett, Cervone attorney pushed forward, refusing to respond to the objection. When this came before the courts, this same document (Exhibit 3) was used to disqualify me as being a "credible witness" before the courts. In doing so, I allege that this act was carried out to deliberately mislead the court, the decision to disallow me to come forward as a witness in the Brown vs. ATU/CTA case. Also, I allege that in doing so, this act is <sup>a</sup>deliberate attempt to misrepresent the true nature of the issue of this true Return to work / tentative agreement.

There ~~is~~ ~~are~~ reasons why these documents were altered.



that, because, the following violations  
have become clear.  
It is, Code 31518 - Destruction, alteration or  
fabrication of records (known to work)  
aggravated (intentional or reckless).  
The law, 31518, is not a self, is not a self,  
is not a self (aggravated) and a felony (aggravated)  
and other documents, 31518, 31518, 31518,  
this section) find on the court, finding violations  
herein. I was granted 31518, 31518, 31518,  
stated "something doesn't look right here."  
Good, Great, Small, various reasons, finding  
forward, refusing to respond to the objection,  
when this case before the court, this case  
document (Exhibit 3) was used to establish  
me as being a "credible witness" before the  
court. In doing so, I alleged that this act  
was carried out to deliberately mislead the  
court, the decision to disallow me to come  
forward as a witness in the *Beau vs. Albin*  
case. Also, I alleged that in doing so, this act  
is "deliberate attempt to misrepresent  
the true nature of the issue of this  
the *Beau vs. Albin* litigation agreement."  
There is a ~~document~~ <sup>document</sup> and why the  
document is being offered.

The reasons why these documents were altered actually stemmed from two whistle blowing acts by Plaintiff against both Rahm Emanuel, and ATU President Keith D. Hill. THE Whistleblower<sup>Complaint</sup> can be found in my email against Rahm Emanuel. My calling out and exposure of a private, backroom deal of a school property between Rahm Emanuel and ATU President Keith D. Hill can be viewed via Facebook groups. I have in my possession the contractual agreement of the property located on 8363 S. Kerfoot Ave, 501 W 84<sup>th</sup> Street, Chicago IL, 60620. Thanks to a collaboration of fellow co-workers, was I able to obtain a copy of this contract. When I suggested to post this, nobody would come forward to do so, because of retaliation from the union president Hill. So I, stepped up bravely, and made sure "ALL" co-workers were able to see this contractual agreement. The majority knew nothing about. After which, I was retaliated against by president Hill. From being harassed at a small job I repair vehicles, to online (Facebook) being accused of Being a felon, with multiple felonies.





Felonies to date, both the C.T.A. nor The ATU local 241 to date refuse to prove to exist. Even after I personally hand delivered the documents requested by president Hill, still to date has never been rectified. Documents were obtained at 555 W. Harrison, as that was the very last courthouse I had a hearing. I was instructed by the representative what pages to submit to the union. The recording secretary made sure I witnessed her, place the requested documents in his office. I thanked Recording Secretary Toi Bowers for doing that and left the union office. To date, no response. However, during a dispute on facebook pertaining to the school property, L. Jones, (retired) came on and asked on President Hill's request and behalf, if Hill could have my permission to post the documents I hand delivered to his office. I immediately denied the request stating, "He must ask me that himself". Nothing after that.



Enter Gus Stevens. A former union ~~Representative~~ Representative with ATU local 241 and now retired serviceman in maintenance department. Mr. Stevens, once catching wind of what happened to me, volunteered to aid in bringing forth most of the evidence being presented to the courts. He too possesses the true documents mentioned, via FOIA. In doing so, Mr. Stevens also discovered an anomaly in my work record as well. His experience and knowledge as a Union Representative will also be a major impact on the true nature of this issue. Therefore, I trust him as my Expert Witness.



Enter, Gus Stevens. A former union representative with AIA local 101 and now retired, Stevens was in a restaurant in the city of New York, New York, on the day of the shooting. Stevens, once entering the restaurant, was asked to wait in the back of the building. Stevens, who was a volunteer to ride in the building, took most of the evidence being presented to the court. He too possesses the two documents mentioned, the FOIA. In doing so, Mr. Stevens also discovered an anomaly in my work record as well. His experience and knowledge as a union representative will also be a major impact on the true nature of this issue. Therefore, I trust him as my expert witness.

## Exhibit 2: Collusion

This document from the Illinois Labor Relations Board clearly demonstrates another false claim of Plaintiff being a felon. Two complaints were filed. One against ATU 241 and C.T.A. Both were dismissed due to late filing. Yet, The act to misrepresent my record and mislead the ILRB was committed. Exhibit 2, is actually for the CTA. ATU president Hill spoke on behalf of the CTA's false felony findings. The CTA at no time stated otherwise and allowed The ATU president to participate in this act. Even though, the courts law enforcement, government and any and all reporting agencies proved otherwise, Both the C.T.A and ATU to date, still manage to uphold these felonies against me that do not exist.



1. The first step in the process is to identify the relevant facts and issues. This involves a thorough review of the pleadings, discovery, and any other evidence that may be relevant to the case.

2. Once the facts and issues are identified, the next step is to analyze the applicable law. This involves researching the relevant statutes, regulations, and case law to determine the legal principles that govern the case.

3. The third step is to apply the law to the facts of the case. This involves a careful analysis of the evidence and the legal principles to determine how the law applies to the specific facts of the case.

4. The fourth step is to reach a conclusion. This involves synthesizing the facts, the law, and the analysis to reach a final conclusion on the issues presented in the case.

5. Finally, the conclusion is written up in a clear and concise manner. This involves organizing the facts, the law, and the analysis into a coherent and logical structure that clearly states the conclusion and the reasoning behind it.

The process of legal analysis is a complex and iterative one, and it often requires a great deal of research, analysis, and writing. However, by following these steps, a lawyer can ensure that they are providing a thorough and accurate analysis of the legal issues in a case.

Therefore I Daniel J. Fryar IV  
(Plaintiff) am requesting the following  
from CTA only:

- 1.) Proof of "Any" findings of felonies.  
Including who performed the  
background check. Date of finding,  
whom overseen this background check  
clearance from courts, ILRB, and all  
reporting agencies to post these findings  
to other ~~potential~~ employers.
- 2.) Do Not Hire List. Who placed, placed  
plaintiff on this list. What qualified  
plaintiff to be placed on this list.
- 3.) Work record from 2012-2014.
- 4.) Copy of any and all felony/felonies  
brought before the courts. Including  
Judge/Judges, Case Numbers, Dates, ~~and~~<sup>of</sup>  
When felonies occurred between 2014  
2016, and 2016 to current date.
- 5.) Under Employer Rights, Provide evidence  
that allows ~~new~~ management to retro-  
actively hold employees accountable  
for violations, acts, issues that were  
addressed prior, Change roles to  
benefit the company, including jeopardizing  
ones livelihood.

Plaintiff is requesting the following from GSA:

- 1) Copy of "Ad" findings of relevance including the date of finding, back ground check, date of finding, when observed, the background check clearance from GSA, and all reporting agencies to past three years to other federal employees.
- 2) To list the list who placed/placed plaintiff on the list about qualified plaintiff to be placed on the list.
- 3) Work record from 2010-2014.
- 4) Copy of any and all training/fellowship grant details the court including Title, dates, case number, dates, when fellow was received between 2010-2014, and 2015 to current date.
- 5) Under Employee Rights, provide evidence that shows any management to create a hostile work environment, as well as for violations of, cases that were addressed prior, change rules to benefit the company, including reporting cases.



Therefore I Daniel J. Fryar II (Plaintiff) am requesting the following from ATU 241 only:

- 1.) Proof of findings of felonies. Including specifically: Court Dates, Incarceration facility, Judge(s), How much time served.
- 2.) The "Original" copies of Plaintiff's return to work agreements 2012, 2016, and 2018 which is in the Union's possession.
- 3.) Copy of court documents ordered/ instructed to be submitted to President Hill, by Hill. These documents were produced at my expense at 555 W. Harrison.
- 4.) Copy of contract of school property located on 83rd & Vincennes Ave., signed by ATU president and Rahm Emanuel. Along with full agreement of the entire union membership.
- 5.) Any and all documents pertaining to Plaintiff's Work Record.
- 6.) Names, badge numbers, positions work locations of those whom presented the claims of plaintiff

1. The Plaintiff is requesting the following from the Defendant:

1) A list of all the names of the members of the Defendant's organization who have been in contact with the Plaintiff in the last 12 months.

2) The "original" copies of all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests.

3) A copy of all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests, including all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests.

4) A copy of all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests, including all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests.

5) A copy of all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests, including all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests.

6) A copy of all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests, including all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests.

7) A copy of all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests, including all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests.

8) A copy of all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests, including all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests.

9) A copy of all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests, including all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests.

10) A copy of all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests, including all the documents that the Defendant has produced or is producing in response to the Plaintiff's discovery requests.



having felonies, discovered felonies in background check. This includes text, emails, fax, mailed letters.

### 7.) Do NOT Hire List.

Who is the Author/decision maker of this list. Who all agreed, and how Plaintiff qualified to be placed on this list.





4. Defendant, Keith D. Hill, is  
(name, badge number if known)

☒ an officer or official employed by C.T.A + ATU Local 241 President  
(department or agency of government)  
\_\_\_\_\_ or

☐ an individual not employed by a governmental entity.

***If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.***

5. The municipality, township or county under whose authority defendant officer or official acted is COOK. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 7-24-23, at approximately 9:00 ☒ a.m. ☐ p.m.  
(month, day, year)  
plaintiff was present in the municipality (or unincorporated area) of CHICAGO  
IL., in the County of COOK,  
State of Illinois, at \_\_\_\_\_,  
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☒ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other:  
HARRASSED, POSTED FALSE CLAIMS TO SOCIAL MEDIA,  
MADE FALSE STATEMENTS TO FLRB ON BEHALF OF

4. Defendant, Kathryn Kunde, is  
(name, badge number if known)

☐ an officer or official employed by C.T.A.;  
(department or agency of government)

\_\_\_\_\_ or

☐ an individual not employed by a governmental entity.

***If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.***

5. The municipality, township or county under whose authority defendant officer or official acted is Cook. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 7-24-23, at approximately 9:00 ☒ a.m. ☐ p.m.  
(month, day, year)  
plaintiff was present in the municipality (or unincorporated area) of Chicago  
\_\_\_\_\_, in the County of Cook,

State of Illinois, at 567 W. Lake St. C.T.A. Headquarters,  
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☒ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other:

Misrepresentation of Documents, Drafting unenforceable contract, violations of U.S. Constitution, mishandling

①

CITA, Refuses to follow up, Job interference

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged):* Keith Hill

8. Plaintiff was charged with one or more crimes, specifically:

False Felony charges (as explained by  
named person K. Hill)

9. *(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")* The criminal proceedings

☐ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>

☒ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows Refusal of representation, collusion  
with city and company.

☐ Other: \_\_\_\_\_

<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.



of my complete record.

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: **(Leave blank if no custom or policy is alleged):** \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

8. Plaintiff was charged with one or more crimes, specifically:

Unknown felonies, NOT being forthcoming with a 2005 misdemeanor to management w/o investigation. Allowed altered documents to be submitted into court, with my signature being forged into them.

9. **(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")** The criminal proceedings

☐ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>

☒ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows Multiple felonies NO COURT, NO LAW

ENFORCEMENT agencies could find. Refusal of finding.

☒ Other: Unknown Felony charges, Dates, Courts or

Judges

<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

Accepted gift/reward/bribe from Former Mayor  
Rahm Emanuel in the form of a School property ATO  
members (92%) knew nothing about, in exchange  
to allow questionable discharges to continue so  
the company could be privatized. Interfered  
with discharged employees hiring at PACE  
Suburban, and/or elsewhere. Promoted discharge  
on behalf of C.T.A. Allowed the C.T.A. to falsely  
accuse me of having multiple felonies never  
committed.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

Unable to advance at PACE Suburban, Loss of  
Employment.

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

③

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

~~background check, unreasonable search of records~~  
~~altering, manipulation of contracts, submitting~~  
~~altered contracts in a court case, refusal to~~  
~~produce any findings of felonies, court info.~~  
~~On July 26, 2023, During a deliberations hearing,~~  
~~an exhibit of evidence was submitted that~~  
~~clearly shows the act of Ex Post Facto and altering~~  
~~of documentations which prevented Plaintiff~~  
~~to return to work. Also, Attorney for C.T.A. Andrew~~  
~~Scott continued the act by questioning plaintiff~~  
~~violating Ex Post Facto under <sup>Article</sup> 1 s9.c3.31 and~~  
~~Article 10.c1.5 No bill of attainder,~~

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

~~Unable to return to work whole, Not able to~~  
~~work at PACE suburban, loss of residence,~~  
~~family separation, loss of income~~

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No



**STATE OF ILLINOIS  
ILLINOIS LABOR RELATIONS BOARD  
LOCAL PANEL**

Daniel J. Fryar, IV,

Charging Party

and

Amalgamated Transit Union, Local 241,

Respondent

Case No. L-CB-19-039

**DISMISSAL**

On February 1, 2019, Daniel J. Fryar, IV (Charging Party) filed a charge in Case No. L-CB-19-039 with the Local Panel of the Illinois Labor Relations Board (Board), in which he alleged that the Respondent, Amalgamated Transit Union, Local 241 (Respondent) engaged in unfair labor practices within the meaning of the Illinois Public Labor Relations Act (Act), 5 ILCS 315 (2014), *as amended*. After an investigation conducted in accordance with Section 11 of the Act, I determined that the charge fails to raise an issue of law or fact sufficient to warrant a hearing. I hereby dismiss this charge for the following reasons.

**I. INVESTIGATION**

The Chicago Transit Authority (CTA) (Employer) employed Charging Party as Bus Operator until November 2014. As such, he was a member of a bargaining unit (Unit) represented by Respondent. Respondent and Employer are parties to a collective bargaining agreement (CBA) for the Unit that includes a grievance procedure culminating in final and binding arbitration. Charging Party alleges that Respondent violated Section 10(b)(1) of the Act when it failed to represent him



14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

**WHEREFORE**, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Daniel J. Fryar II

Plaintiff's name (print clearly or type): Daniel J. Fryar II

Plaintiff's mailing address: 9100 S. JUSTINE AVE.

City CHICAGO State IL. ZIP 60620

Plaintiff's telephone number: ( 708 ) 310-8749

Plaintiff's email address (if you prefer to be contacted by email): Kn1ghTguy48@gmail.com  
Kn1ghTguy48@gmail.com (K n #1 g h T guy)

15. Plaintiff has previously filed a case in this district. ☒ Yes ☐ No

*If yes, please list the cases below.*

**Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.**